

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**AVESHKA, INC.**

**Plaintiff,**

**v.**

**GLOBAL RECORD SYSTEMS, LLC**

**Defendant.**

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**Case No. 1:14-cv-01006 GBL-IDD**

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**MEMORANDUM IN SUPPORT OF PROTECTIVE ORDER**

Defendant Global Record Systems, LLC, by counsel, and non-party Sandra Garrett, pursuant to Fed. R. Civ. P. 26 and 30, as their grounds for moving for a protective order to limit any resumed deposition of Sandra Garrett, which began on April 1, 2015, or second deposition of Sandra Garrett, to (1) subject matter not encompassed by the November 6, 2014 Notice of Post-Judgment Deposition on Oral Examination, attached as Exhibit 1 to Defendant's Opposition to Motion for Sanctions and to Compel Continuation of Deposition (filed at Docket 43), (2) subject matter not encompassed by any other Fed. R. Civ. P. 30(b)(6) notice issued by Plaintiff to Defendant in this case, and (3) subject matter properly inquired about pursuant to Fed. R. Civ. P. 26, incorporate by reference the content of Defendant's Opposition to Motion for Sanctions and to Compel Continuation of Deposition (filed at Docket 43).

GLOBAL RECORD SYSTEMS, LLC  
SANDRA GARRETT  
by Counsel

/s/ Stephen D. Charnoff

Stephen D. Charnoff (VSB No. 65329)

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*Counsel for Defendant Global Record Systems, LLC  
and non-parties Sandra Garrett, Bruce Garrett, and  
Julie Garrett*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of May, 2014, I will (1) hand-deliver this pleading to Marc Busman, Esq. at 7012 Wolf Run Shoals Rd., Fairfax Station, Virginia, 22039 and (2) electronically file this pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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GLOBAL RECORD SYSTEMS, LLC  
SANDRA GARRETT  
by Counsel

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